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Accident Plaintiffs Represented by
Hilliard Martinez Gonzales L.L.P.
Listed on Exhibit B Hereto*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**SECOND NOTICE OF WITHDRAWAL AS COUNSEL OF RECORD
FOR CERTAIN MOVANTS UNDER OMNIBUS MOTION BY CERTAIN
IGNITION SWITCH PRE-CLOSING ACCIDENT PLAINTIFFS
FOR AUTHORITY TO FILE LATE PROOFS OF CLAIM
FOR PERSONAL INJURIES AND WRONGFUL DEATHS [DOCKET NO. 13807]**

WHEREAS, Goodwin Procter, LLP (“**Goodwin**”) represents the law firms of Hilliard Martinez Gonzales L.L.P. (“**HMG**”) and Thomas J. Henry Injury Attorneys (“**TJHIA**”) in connection with their representation of claimants asserting personal injury and wrongful death claims against the debtors in the above-captioned chapter 11 cases (“**Old GM**”) and General Motors LLC (“**New GM**”).

WHEREAS, on December 22, 2016, Goodwin filed that certain *Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [Docket No. 13807] (the “**Motion**”) on behalf of those certain HMG and TJHIA clients listed on Exhibit A to the Motion (the “**Movants**”). Attached as Exhibit B to the Motion were copies of each Movant’s proposed proof of claim against Old GM’s chapter 11 estate.

WHEREAS, on December 4, 2017, Goodwin filed a *Notice of Withdrawal As Counsel Of Record For Certain Movants Under Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [Docket No. 13807] [Docket No. 14179], pursuant to which Goodwin withdrew as counsel to thirty Movants that were no longer clients of HMG and TJHIA pursuant to Order No. 137 entered in the multi-district litigation pending before the Honorable Jesse M. Furman of the United States District Court for the Southern District of New York, *In re General Motors LLC Ignition Switch Litigation*, MDL No. 2543 (JMF) (S.D.N.Y.) (the “**MDL**”) [MDL Docket No. 4840].

WHEREAS, on March 22, 2017, in connection with the MDL, claimant Glenn Stanley voluntarily dismissed his claims [MDL Docket No. 3769].

WHEREAS, on January 24, 2018, HMG and TJHIA notified claimant April Gill of the withdrawal of those firms as Ms. Gill's counsel. HMG and TJHIA did not file a motion to withdraw in the MDL because Ms. Gill did not have a complaint or claims pending in the MDL.

WHEREAS, on February 22, 2018, in connection with the MDL, claimant Dwayne Waithe voluntarily dismissed his claims. [MDL Docket No. 5096].

WHEREAS, on February 27, 2018, in connection with the MDL, the following claimants voluntarily dismissed their claims: John Hairston, Richard Rooney, Elizabeth Burns, Willie Shells, Chelsea Dirks Vargas, and Kim Lopez [MDL Docket No. 5142].

WHEREAS, on March 2, 2018, in connection with the MDL, claimant Tracy West voluntarily dismissed her claims [MDL Docket No. 5159].

WHEREAS, Goodwin, HMG and TJHIA have learned that claimant Kally Surbeck filed a timely proof of claim in the Debtors' cases (claim no. 13046), which was allowed. HMG and TJHIA continue to represent Ms. Surbeck in the MDL.

WHEREAS, Goodwin, HMG and TJHIA have learned that claimant Lisa Allen has entered into a settlement agreement that purported to release her claims against Old GM.

WHEREAS, claimant Santoria Gibbs has terminated HMG and TJHIA as her counsel. HMG and TJHIA have not yet filed, but will file, a formal motion to withdraw in the MDL.

WHEREAS, on March 9, 2018, in connection with the MDL, claimant Mary Gibson's claims were dismissed [MDL Docket No. 5195].

WHEREAS, on May 24, 2017, HMG and TJHIA notified claimants Veronica Lynn Davis, Marjorie Lockhart, Justin Maclin, Myra Washington, Joell Platzke, Julie Moza, Richard Moza, Shirely Pylar, and Janet Reetz, of the withdrawal of those firms as these claimants'

counsel. HMG and TJHIA did not file a motion to withdraw in the MDL because these claimants did not have a complaint or claims pending in the MDL.

WHEREAS, those certain Movants listed on Exhibit A hereto (the “**Affected Movants**”) are no longer pursuing claims relating to their pre-closing accidents and/or are no longer clients of HMG or TJHIA.¹

WHEREAS, those certain Affected Movants marked with an “*” on Exhibit A (the “**Claim Withdrawn Movants**”) have affirmatively consented to HMG and TJHIA withdrawing their proofs of claim from the Motion.

NOW THEREFORE, PLEASE TAKE NOTICE THAT, pursuant to Rule 2090-1(f) of the Local Bankruptcy Rules for the Southern District of New York, Goodwin withdraws as counsel of record for the Affected Movants in these chapter 11 cases and will not be prosecuting the Motion on behalf of the Affected Movants.

PLEASE TAKE FURTHER NOTICE THAT, the Claim Withdrawn Movants hereby affirmatively withdraw their proofs of claim from the Motion.

PLEASE TAKE FURTHER NOTICE THAT, a list of the Movants on whose behalf Goodwin continues to pursue the Motion is attached hereto as Exhibit B. HMG and TJHIA will provide the Affected Movants with this notice in order to give them an opportunity to find replacement counsel to join in the Motion or otherwise pursue authority to file a late proof of claim in these chapter 11 cases.

¹ Kally Surbeck, however, remains a client of HMG and THJIA. As noted on Exhibit A, she has affirmatively consented to the withdrawal of her proof of claim from the Motion.

Dated: April 25, 2017

Respectfully submitted,

/s/ William P. Weintraub

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